John Sharkey March 16,2007

Idaho Dept. of Water Resources

Boise Idaho

Dear Mr. Sharkey:

When I was at the Oregon Groundwater spring convention at Wilsonville OR March first of this year, we listened to a speaker from one of the Wyoming bentonite companies use a definition of "chips" as "a high moisture bentonite". It is a well known fact that dry Wyoming clays hydrate very quickly and in order to slow that process down the "chips" are high moisture when put into the bag. That same speaker stated that "granular" bentonite is a dry product.

The processing we do with our Perma Plug bentonite creates a dry bentonite granule. Our bentonite is a much slower hydrating product than dry Wyoming bentonite so we do not have the need to bag it wet.

My point is, why call them Chips and Granules, why not the same name as long as they meet the other criteria of permeability, size, etc.? The word Granular seems quite generic to me and covers them both.

Another thing I discovered at the meeting was that many of the drillers stated that our 3/8" granular bentonite was smaller than the Wyoming 3/8" products and that is why we would like the Medium sizing range to top at 1/2" so we would all be more in sync.

A lot of granular grouts such as other's #8 and our #5, (5x20 mesh) and #20,(20 x 50 mesh) probably have fines (minus #50 mesh) more than 2%. I hate to put a number on it because of the nature of clays, in the smaller sizes, fines are not easy to control. Because they are not poured through water, it should not be as big an issue if they are poured the required rate by drillers. These are still a granular product and I believe a # 10 is an extremely bad size to specify for a "fine". We believe it would cause the bentonite industry a problem to meet that criteria on the smaller granules.

These are the changes we would like to see :

Large Granular Bentonite: Between 1” & 1/2", less than 2% fines

Medium Granular Bentonite: Between 1/2" & 5 mesh, less than 2% fines

Small Granular Bentonite: Between 5 mesh & 50 mesh

Fines: Dry bentonite material that passes a # 50 standard sieve

You seem to be making progress on the draft, since I see changes once in awhile. We hope this is helpful.

Best regards,

Marie Teague

Teague Mineral Products